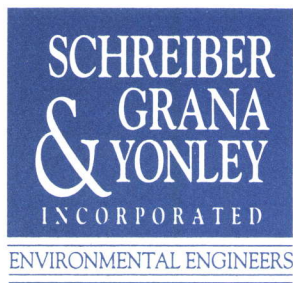


AI



271 Wolfner Drive ■ Saint Louis, Missouri 63026
314/349-8399 ■ Fax 314/349-8384

May 5, 1995

Mr. Ruben McCullers
Environmental Scientist
USEPA, Region VII
WSTM/RCRA/RCOM
726 Minnesota Avenue
Kansas City, KS 66101

RECEIVED

MAY 08 1995

RCOM SECTION


Dear Mr. McCullers:

On behalf of our client, The Knapheide Mfg. Co., we are submitting the enclosed Supplemental Environmental Project Investigation Plan. This plan is being submitted pursuant to the First Modification to Consolidated Consent Agreement and Consent Order entered between the EPA and Knapheide on March 8, 1995.

If you have any question(s) or need additional information, please contact me or Gerry Korb.

Sincerely,

SCHREIBER, GRANA & YONLEY, INC.


for Robert J. Schreiber, Jr., P.E.
President

RJS/vp/cp

cc: Chief, Hazardous Waste Permit Section - MDNR
Gerry Korb
Dan Punzak, IEPA
Sandra Oberkfell

Encl.
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RCRA Records Center



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MAY 08 1995

RCOM SECTION

**SUPPLEMENTAL ENVIRONMENTAL
PROJECT INVESTIGATION PLAN**

May 5, 1995

PREPARED FOR:

**THE KNAPHEIDE MFG. CO.
436 SOUTH SIXTH STREET
QUINCY, ILLINOIS 62306-2140**

SUBMITTED TO:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII
KANSAS CITY, KANSAS**

PREPARED BY:

**SCHREIBER, GRANA & YONLEY, INC.
271 WOLFNER DRIVE
ST. LOUIS, MISSOURI 63026**



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ATTACHMENT A RESUMÉS



1.0 INTRODUCTION

Pursuant to paragraph 3 of the First Modification to Consolidated Consent Agreement and Consent Order (Consent Order) entered into between the United States Environmental Protection Agency (EPA), Region VII, and The Knapheide Mfg. Co. (Knapheide), dated March 8, 1995, Schreiber, Grana & Yonley, Inc. (SGY) is pleased to submit this Supplemental Environmental Project Investigation Plan (SEP Plan).

This SEP Plan has been designed to identify environmental improvements that may be made at the Knapheide facility located at 1701 North 16th Street in Quincy, Illinois, in addition to items identified in paragraphs 1 and 2 of the Consent Order, and considered for future implementation of the new permanent facility. This SEP Plan contains the following items:

- a) A description of the procedures that will be followed during the SEP investigation and development of the SEP Report;
- b) A schedule for the performance of the SEP investigation;
- c) A cost estimate for the development of the SEP Plan, performance of the SEP investigation, and development of the SEP Report; and,
- d) SGY's project officer's statement of qualifications.

This SEP Plan has been prepared by SGY, who has no affiliation or financial interest in Knapheide or a parent, subsidiary or affiliate of Knapheide.

Upon the successful completion of the SEP investigation and SEP Report, SGY will provide a list of SEPs for consideration at the existing temporary Knapheide facility and at the new permanent location.

2.0 SCOPE OF SEP INVESTIGATION

2.1 Environmental Evaluation

SGY will perform a comprehensive environmental evaluation of the Knapheide facility located at 1701 North 16th Street in Quincy, Illinois. This facility audit will consist of a detailed site and facility walk-through, as well as a comprehensive examination of all applicable facility records.

SGY will be identifying any environmental improvements or SEPS that may currently be considered for the temporary facility and considered for future implementation at the new permanent facility. SGY will also evaluate facility operations for compliance with all applicable federal, state and local environmental laws and regulations.



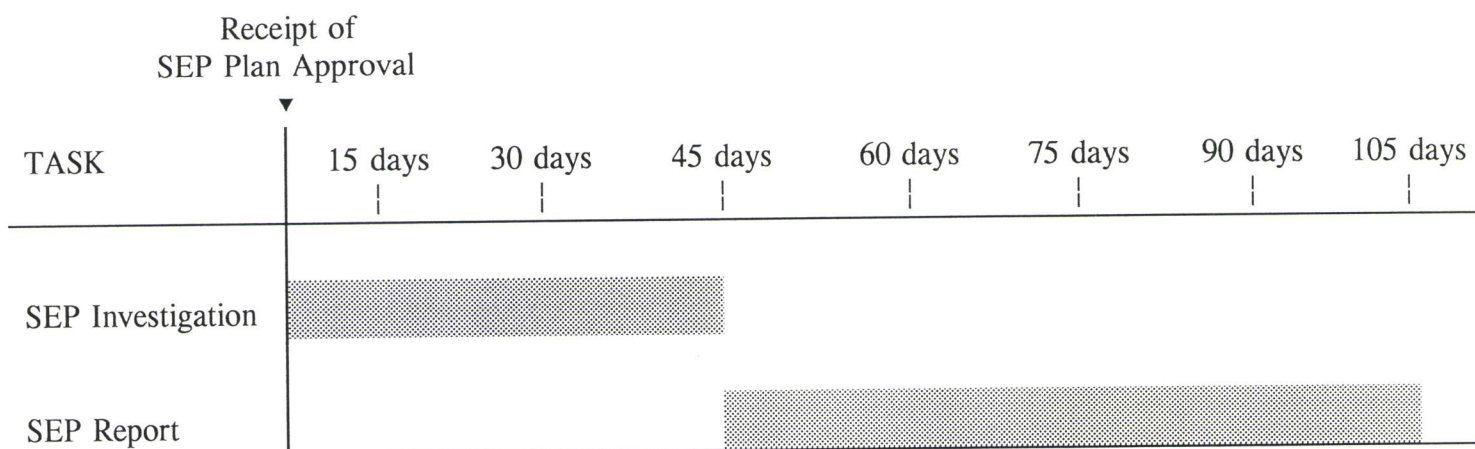
2.2 SEP Report

Upon completion of the SEP investigation, SGY will develop and submit to the EPA a SEP Report. The SEP Report will detail the results of the SEP investigation. The SEP Report will include a description of the facility and its current compliance status with all applicable federal, state and local environmental laws and regulations, as well as identification of waste streams, emissions and current releases to all environmental media.

If it is determined that the facility is not in compliance with any applicable environmental law, the SEP Report will include a schedule and plan for coming into compliance. Additionally, SGY will provide recommendations as to suggested improvements and/or modifications which could be made to Knapheide operations to facilitate compliance with environmental laws and regulations, or which could benefit the environment independent of regulatory status, including descriptions of any projects which may be considered as SEPs. SGY will also develop a cost estimate and a statement of environmental benefits for each identified SEP.

3.0 SCHEDULE

Presented below is the SEP investigation and SEP Report schedule. The schedule will begin upon receipt of the SEP Plan approval from the EPA. It is anticipated that 15 weeks will be required to complete the scope of activities.



Please note that this schedule may need to be amended if significant modifications occur during the SEP Plan review by the EPA.

4.0 BUDGET

The following table presents the anticipated cost estimate for completion of the SEP Plan, SEP investigation and SEP Report.



	Task	Cost Estimate
1.	SEP Plan Development	\$800.00
2.	SEP Investigation Implementation	\$19,000.00
3.	SEP Report Development	<u>\$7,500.00</u>
	TOTAL	\$27,300.00

Please note that this cost estimate may need to be amended if significant modifications occur during the SEP Plan review by the EPA.

5.0 PROJECT OFFICERS QUALIFICATIONS

SGY's project officer for this project is Robert J. Schreiber, Jr., P.E. Mr. Schreiber's resumé is provided in Attachment A. Mr. Schreiber will head-up an audit team consisting of highly qualified and trained personnel. Personnel anticipated to be part of the audit team are Mr. F. Donald Maddox and Mr. Viraf Palsetia. Resumés of these individuals are also included in Attachment A.



ATTACHMENT A

RESUMÉS



Robert J. Schreiber, P.E.
President
St. Louis, Missouri

Education

B.S. Chemical Engineering, 1972

Active Registrations

State of Missouri, 1977

State of Illinois, 1987

State of Georgia, 1988

State of Kansas, 1989

State of Arkansas, 1991

State of California, 1991

State of Maryland, 1991

State of Pennsylvania, 1991

State of Virginia, 1991

State of Florida, 1992

Puerto Rico, 1993

State of Alabama, 1993

State of Colorado, 1993

State of New Hampshire, 1993

State of New Jersey, 1993

State of New York, 1993

State of South Carolina, 1993

State of Mississippi, 1994

State of Montana, 1994

Years of Experience

23

Professional Experience

Mr. Schreiber is an internationally recognized environmental engineer with over 20 years of experience in regulatory compliance and management. As a result of his vast expertise in both industrial and regulatory processes, he is often called upon to provide technical assistance, including development of research protocols, and to serve as an expert witness. He has been invited by numerous national and international organizations to speak on current regulatory and compliance issues, such as recommendations of new dioxin standards for USEPA.

Primary Responsibilities

Since 1988, Mr. Schreiber has served as President of Schreiber, Grana & Yonley, Inc., and Vice President of Perma-Fix Kiln Services, Inc., St. Louis, Missouri. As President of Schreiber, Grana & Yonley, Inc., he is responsible for the overview of all environmental consulting projects for industrial clients. In addition, he has managed numerous environmental auditing projects and developed multi-media environmental programs for industries in order to bring them into compliance with all environmental regulations. As Vice President of Perma-Fix Kiln Services, Inc., he has been heavily involved with technical assistance and environmental permitting issues for waste management facilities.

Prior Experience

Lafser & Schreiber, Inc., St. Louis, MO (1985-1988, Vice President). In addition to being responsible for environmental issues and industrial clients, Mr. Schreiber was project manager for various projects, including research and development of an alternative technology to dispose of organic and inorganic solid hazardous waste.

Missouri Department of Natural Resources, Jefferson City, MO (1980-1985, Director for the Division of Environmental Quality). Responsible for management and coordination of eight environmental programs within the division which included: air pollution control, solid and hazardous waste management, land reclamation, soil and water conservation, water pollution control and public drinking water testing. He also supervised the study design of the Weldon Spring Investigation Remedial Action Plan (for the control of radioactive waste deposits) and the Times Beach, Missouri Remedial Investigation/Feasibility Study (for the control of dioxin-contaminated soils).

Missouri Department of Natural Resources, Jefferson City MO (1978-1980, Director of the Air Pollution Control Program).

Missouri Department of Natural Resources, Kansas City, MO (1974-1978, Environmental Engineer).

Illinois Environmental Protection Agency-Air Pollution Control Program (1972-1974, Environmental Engineer).



Franklin D. Maddox, P.E.
Senior Engineering Manager
St. Louis, Missouri

Education

M.S. Sanitary Engineering, 1964
B.S. Civil Engineering, 1962
B.S. Mechanical Engineering,
1960

Active Registrations

State of Ohio, 1968
State of Missouri, 1990
State of California, 1991
State of Illinois, 1992
State of Wisconsin, 1992
State of Indiana, 1993
State of Michigan, 1993
State of Florida, 1994

Years of Experience

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Professional Experience

Mr. Maddox has gained extensive environmental compliance experience from both regulatory agencies and the industrial sector. He provides guidance to industrial, commercial and public clients regarding environmental regulatory compliance requirements for their operations.

Primary Responsibility

Technical and legal research regarding environmental regulations including: RCRA, SARA, CERCLA, CWA, CAA, and SDWA. In addition, he manages remedial clean-ups, conducts audits of industrial operations and prepares various permit applications.

Prior Experience

Missouri Department of Natural Resources, St. Louis, MO (1981-1989, Regional Administrator). Mr. Maddox managed a staff of 25 individuals responsible for state environmental response within ten counties centered in the St. Louis metropolitan area. These responsibilities included the determination of compliance with air pollution control, water pollution control, public drinking water testing, solid waste management and hazardous waste management laws.

USEPA Region V Drinking Water Technical Support Section, Chicago, IL (1976-1981, Chief). Mr. Maddox supervised a staff of six, directed toxicological and treatment option evaluations of water supply contamination cases and participated in the establishment of Safe Drinking Water Act (SDWA) regulations.

USEPA Region V (1969-1976, Chief of the Program Support Branch-Air Pollution Control & Water Supply, Regional Representative - Water Supply, Staff Engineer). Responsible for directing the Air Pollution Control Program, the Water Supply Program and the Noise Control Program.

Department of Health Education and Welfare-Water Supply Program, Cincinnati, OH (1967-1969, Chief of Water Resources). Directed the Water Supply Program input to the Water Resources Studies led by the U.S. Corps of Engineers.

Environmental Health Services-Water Supply Program, Department of HEW, Washington, DC (1966-1967, Staff Engineer). Provided support and assistance to the nine Water Supply Program regional offices.

Technical Assistance Branch - Air, Department of HEW, Cincinnati, OH (1962-1966, Staff Engineer). Assisted in the development of local and state air pollution control regulations and provided backup to the comprehensive St. Louis Metropolitan Air Quality Study conducted in 1964-1967.

New York State Air Pollution Control Program (1961-1962, Staff Engineer). Assisted in the installation of ambient air monitoring stations and conducted emission inventories and complaint investigations.



Viraf K. Palsetia
Sr. Environmental Engineer
St. Louis, Missouri

Education

M.B.A., 1980
M.S. Chemical Engineering, 1978
Bachelor of Technology,
Chemical Engineering, 1975

Years of Experience

14

Professional Experience

Since 1987, Mr. Palsetia has provided regulatory insight for projects related to environmental compliance audits, hazardous waste Part B permit applications, and SARA Title III requirements. He serves as a project manager or engineer in the Regulatory Permitting and Compliance group of Schreiber, Grana & Yonley, Inc.

Primary Responsibilities

Preparing Part B applications for hazardous waste TSD facilities; preparing applications to regulatory agencies for resource recovery certifications, air permits, and NPDES permits; performing complete environmental compliance evaluations; conducting RCRA closure activities at TSD sites; performing UST assessments; managing hazardous waste remediation projects; preparing air emission inventory questionnaires; and preparing environmental reporting under SARA 312 and 313.

Project Descriptions

Confidential Chemical Company, St. Louis, MO. Project Engineer involved in the development of a SARA Title III compliance manual. The manual was prepared to assist distributors in complying with SARA Title III requirements. He now serves as Project Manager responsible for updating the manual to reflect regulatory changes.

Confidential Cement Kiln, Holly Hill, SC. Project Manager responsible for preparation of a hazardous waste Part B permit application for a storage and treatment facility.

Bull Moose Tube Company, Various Locations. Responsible for providing on-going comprehensive environmental engineering services. Projects have included performing environmental compliance audits and preparation of SARA Title III reporting forms, air emission inventory questionnaire, SPCC plan, hazardous waste training program and contingency plan, as well as a hazard communication program as required under OSHA.

Prior Experience

Missouri Department of Natural Resources, St. Louis, MO (1983-1987, Environmental Engineer). Responsible for reviewing engineering plans and specifications of wastewater treatment facilities; performing compliance evaluations through on-site inspections of hazardous waste generators and TSD facilities; performing pretreatment compliance evaluations of major POTWs; and processing of NPDES permit applications.

Missouri Department of Natural Resources, Macon, MO (1981-1982, Environmental Engineer). Duties included review of engineering plans and specifications for drinking water plants and distribution network; processing of NPDES permit applications; and performing environmental compliance evaluations of drinking water and wastewater treatment plants.

